

# EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

ROBERT SAMPSON,

v.

NATIONAL BOARD OF MEDICAL  
EXAMINERS.

:  
:  
: CIVIL ACTION NO. 2:22-cv-05120-JMA  
:  
:  
:  
:  
:

**DECLARATION OF MARY CAROLINE VARGAS**

I, Mary Caroline Vargas, make the following declaration upon personal knowledge:

1. I am one of the attorneys representing Robert Sampson.
2. A true and correct copy of my billing records related to my work directly on the Reply Brief to Plaintiff's Motion for Reasonable Fees and Costs is attached as Exhibit 1.
3. I exercised billing judgment and excised from the attached time records all time worked on this matter during the Summer of 2023 other than time spent directly working on the Reply Brief. For example, I excluded all time spent counseling my client, communicating with defense counsel, and communicating with co-counsel.
4. I declare under penalties of perjury the foregoing is true and correct.

Dated: September 18, 2023



---

Mary C. Vargas  
Stein & Vargas, LLP  
10 G Street NE, Suite 600  
Washington, DC 20002  
Tel: (240) 793-3185  
Fax: (888) 778-4620  
Mary.Vargas@steinvargas.com

# EXHIBIT 1

**Vargas, Mary**

7/25/23	0.4	NBME	Review NBME Response to fee petition
9/12/23	0.5	NBME	Review and revise draft reply brief to fee petition
9/14/23	0.3	NBME	Review and revise new draft of reply to fee petition
9/15/23	0.5	NBME	Review and revise draft reply brief to fee petition
9/16/23	0.3	NBME	Review and comment on reply brief
9/17/23	0.2	NBME	Final review and comment resolution on reply brief
<b>Total</b>	<b>2.2</b>		